

Exhibit B

From: [Jennifer Bonjean](#)
To: [Theresa B. Carney](#)
Cc: [Katelyn Salek](#); [Eileen E. Rosen](#); [Austin Rahe](#); [Haley Coolbaugh](#); [Catherine M. Barber](#); [Kara Hutson](#); [Josh M. Engquist](#); [Megan McGrath](#); [Thomas Leinenweber](#); [Jim Daffada](#); [Lindsay Hagy](#); [Samantha J. Pallini](#); [Joseph M. Polick](#); [russell@loevy.com](#); [Julie Goodwin](#); [Margaret Cunliffe](#); [sanjana@loevy.com](#); [Ashley Cohen](#)
Subject: Re: Almodovar/Negron v. Guevara, et. al. - Discovery Extension
Date: Thursday, October 7, 2021 12:36:25 PM
Attachments: [image001\[56\].png](#)
[image002.png](#)

Counsel:

We cannot consent to a general extension but will consent to conducting Grande and Sussman's deposition (if that happens) outside the fact discovery deadline since their depositions have been the subject of a number of disputes. Fact discovery closes today. You have provided NO justification for an overall 60 day extension. You have consistently waited until the eleventh hour, in this case and others, to serve deposition notices as discovery is due to close and then claim that you need an extension to conduct the depositions. Under your approach, discovery never ends. Even if we agreed, on day 59 you would notice another deposition of someone you knew about 3 years ago and then claim that we need another extension. This needs to stop.

Please make sure my email is included as an exhibit in whatever motion you file.

Jennifer Bonjean, Esq.
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On Oct 7, 2021, at 12:49 PM, Theresa B. Carney <tcarney@rfclaw.com> wrote:

Counsel:

Defendants plan to seek an extension of time to complete the remaining discovery, which includes the following depositions:

- Azelia Carillo
- Michelle Pitman – Scheduled for 10/22
- Jackie Grande
- Eric Sussman

While the outstanding discovery is limited, in light of the upcoming holiday season and the travel involved for Ms. Grande's deposition, we plan to ask for 60 days.

Please let me know your position on this extension so that we can file our motion.

Thank you,
Theresa

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